

MONTI JORDANA LEVY, ESQ.
Nevada Bar No. 8158
WRIGHT MARSH & LEVY
300 S. Fourth Street, Suite 701
Las Vegas, NV 89101
Office: (702) 382-4004
Fax: (702) 382-4800
mlevy@wmlawlv.com
Attorneys for Defendant Brandson Cabral

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
BRANDSON CABRAL,)
)
Defendant.)

Case No. 2:20-CR-00124-JCM-BNW

**UNOPPOSED MOTION FOR
PRE-PLEA PRESENTENCE REPORT**

BRANDSON CABRAL, by and through his attorney, MONTI JORDANA LEVY, of
WRIGHT MARSH & LEVY, respectfully moves this Honorable Court to order the Department of
Probation to prepare a pre-plea presentence report to assist the parties in negotiating the instant case¹.

DATED this 25th day of January, 2023.

/s/ Monti Jordana Levy
MONTI JORDANA LEVY
Attorney for Brandson Cabral

///

///

///

///

¹ Defense counsel has met and conferred with the Government prior to filing this motion.
The assigned AUSA has indicated that the Government will not oppose the instant motion.

MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Brandson Cabral is charged by Indictment with one count of Felon in Possession of Firearm. The Government and Mr. Cabral's counsel have been discussing potential negotiations in this matter; however, there are some areas of confusion regarding his prior criminal history and the calculations of credit between state and federal offenses. Counsel believes that once a true calculation of Mr. Cabral's criminal history and an accurate determination of when his sentences had been completed is prepared that the parties will be able to meaningfully discuss resolving the case.

To ensure that Mr. Cabral has all of the information he needs to make a knowing and intelligent decision as to whether to enter into plea negotiations with the Government, he respectfully requests that a Pre-plea Presentence Investigation Report be prepared.

Mr. Cabral's counsel has spoken with the assigned AUSA, Edward Veronda, who stated that he does not oppose this request.

Respectfully submitted,

WRIGHT MARSH & LEVY

/s/ Monti Jordana Levy
MONTI JORDANA LEVY, ESQ.
Attorney for Brandson Cabral

ORDER

IT IS HEREBY ORDERED that the United States Probation office prepare a Pre-Plea Presentence Investigation Report with respect to Defendant Brandson Cabral's criminal history points and corresponding criminal history.

DATED: January 26, 2023.


UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 25th day of January, 2023, I caused a copy of the foregoing **MOTION FOR PRE-PLEA PRESENTENCE REPORT** to be served via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

BY /s/ Debbie Caroselli
An employee of Wright Marsh & Levy